



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**DATE:** NOV 09 2017

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Louis Padnos Iron & Metal Company, Grand Rapids, Michigan

**FROM:** Scott Connolly, Environmental Engineer  
AECAB (IL/IN)

**THRU:** Nathan Frank, Section Chief  
AECAB (IL/IN)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Louis Padnos Iron & Metal Company

**Facility Location:** 2125 Turner Ave. N.W., Grand Rapids, Michigan

**Date of Inspection:** October 3, 2017

**EPA Inspector(s):**

1. Scott Connolly, Environmental Engineer
2. Muhammed Shuaibi, Environmental Engineer

**Other Attendees**

1. Todd Pastoor, Superintendent, Louis Padnos Iron & Metal Company
2. April Lazzaro, Environmental Quality Analyst, MDEQ

**Purpose of Inspection:** To determine compliance with the Clean Air Act.

**Facility Type:** Metal Shredding and Recycling Facility

**Regulations Central to Inspection:** 40 C.F.R. Part 82, Subpart F: Recycling and Emissions Reductions

**Arrival Time:** 8:20 am

**Departure Time:** 10:00 am

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Todd Pastoor unless otherwise noted.

**Process Description:**

The facility obtains and processes light gauge scrap metal received by truck at the facility. Generally, loads of scrap metal are unloaded from trucks into a primary scrap pile near the shredder. Scrap Inspectors check the incoming metal items for non-conforming material, which includes propane tanks, and non-metals. Larger metal pieces are sliced with a mobile or stationary shear. The shredder processes postconsumer ferrous and non-ferrous scrap and vehicles. Cranes load scrap metal onto a conveyor, which feeds the metal into the hammermill shredder. The shredder has remote controls and is operated by the crane operator. The side feeding hammermill is equipped with an automatic water injection system, which sprays water into the shredder to reduce dust and to cool the metal. Shredded metal exits the shredder and is fed through a magnetic separator, which separates non-magnetics from ferrous metal. An eddy current separator and z-box cyclone separates additional non-metallics from the process stream. Ferrous metal is transported by truck to steel mills.

**Staff Interview:** The company owns a chlorofluorocarbon (CFC) recovery machine to remove CFCs from motor vehicle air conditioners refrigerators and other appliances. Refrigerant containing materials receive an orange sticker and are stored separate from other light iron materials until they can be drained. A company employee visits the facility to recover refrigerants once per week. Vehicles and other refrigerant containing items that have been drained prior to arrival at the facility receive a green sticker. Fluids and mercury switches are removed from vehicles at the onsite vehicle processing station. Facility staff stated that the 4000 horsepower shredder, manufactured by Metzo, operates at about 100 tons of scrap per hour and usually shreds 30-40% vehicles.

**TOUR INFORMATION**

**EPA toured the facility:** Yes

**Data Collected and Observations:**

The shredder was observed generating significant amount of visible emissions that included water vapor, but nothing was observed exiting the stack. No emissions were observed being captured by the stack capture hood at the time of the inspection. A ground level haze was observed around the shredder.

**Photos and/or Videos:** were taken during the inspection.  
A photo log is contained in Appendix A.

**Field Measurements:** were not taken during this inspection.

**CLOSING CONFERENCE**

**Requested documents:**

- Copy of Contract for existing customers certifying removal of refrigerants
- Maintenance records of duct from shredder hood to stack
- Scale ticket containing verification statement (1 copy obtained)

**Concerns:** The shredder hood did not appear to be capturing any emissions and was not observed routing anything through the shredder stack. Visible emissions were observed around the shredder during shredding operations.

**SIGNATURES**

Report Author:  Date: 10/30/2017

Section Chief:  Date: 11/9/17

**Facility Name:** Louis Padnos Iron & Metal Company  
**Facility Location:** 2125 Turner Ave. N.W., Grand Rapids, Michigan  
**Date of Inspection:** October 3, 2017

**APPENDICES AND ATTACHMENTS**

1. Appendix A: Digital Image Log

**Facility Name:** Louis Padnos Iron & Metal Company  
**Facility Location:** 2125 Turner Ave. N.W., Grand Rapids, Michigan  
**Date of Inspection:** October 3, 2017

#### APPENDIX A: DIGITAL IMAGE LOG

<b>1. Inspector Name:</b> Muhammed Shuaibi	<b>2. Date(s) of Inspection:</b> October 3, 2017
<b>3. Company/Facility Name:</b> Louis Padnos Iron & Metal Company	<b>4. Street Address, City, State:</b> 2125 Turner Ave. N.W., Grand Rapids, Michigan
<b>5. Number of Images:</b> 9	<b>6. Archival Record Location:</b> Photos are located at:  <a href="https://usepa.sharepoint.com/sites/R5/ARD/AECAB/ILIN/Shared%20Documents/SConnolly/Louis%20Padnos?csf=1">https://usepa.sharepoint.com/sites/R5/ARD/AECAB/ILIN/Shared%20Documents/SConnolly/Louis%20Padnos?csf=1</a>

Image Number	File Name	Date and Time (incl. time zone and DST)	Latitude and Longitude	Description of Image
1	RIMG0014.JPG	10/3/2017 8:07 AM	Data Not Available	Refrigerators with orange stickers that needed to be drained.
2	RIMG0015.JPG	10/3/2017 8:07 AM	Data Not Available	Appliances that were received drained of refrigerants. Appliances appeared to have been drained correctly.
3	RIMG0016.JPG	10/3/2017 8:14 AM	Data Not Available	Vehicle processing station.
4	RIMG0017.JPG	10/3/2017 8:17 AM	43.000555, -85.68924	Scrap pile located next to the shredder and crane loading material onto shredder conveyor.
5	RIMG0018.JPG	10/3/2017 8:18 AM	43.000633, -85.690455	Crane loading Shredder conveyor. Emissions visible exiting top of shredder and no emissions visible exiting shredder stack.
6	RIMG0019.JPG	10/3/2017 8:20 AM	43.000443, -85.691042	Haze visible around shredder tower building and metallic separator.
7	RIMG0020.JPG	10/3/2017 8:21 AM	43.00531, -85.6934	Shredder infeed conveyor from control room. Steam and emissions visible leaving the top of the shredder and not entering duct on side of shredder.
8	RIMG0021.JPG	10/3/2017 8:33 AM	43.000565, -85.681143	Shredder surrounded by rubber flaps for noise and old shredder infeed conveyor
9	RIMG0022.JPG	10/3/2017 8:38 AM	43.000245, -85.682425	Downstream and z-box separation system.

